

From: jessica@ridolfi.com
To: [Laura Shira](#); [DAUGHERTY Katie * DEQ](#); [PARRETT Kevin * DEQ](#)
Cc: [Teresa Michelsen](#); [Kim Magruder Carlton](#); [Robert Dexter](#); [Julie Atwood](#); swan@yakamafish-nsn.gov
Subject: RE: Arkema Upland 2021 GWET SEE
Date: Thursday, May 20, 2021 2:20:00 PM

Hello

I'm resending and including Kevin Parrett because I got an out of office autoreply from Katie indicating Kevin is covering this for the next few weeks, and comments are due during that time. Please see the comments in our email below.

Thanks

JESSICA WINTER-STOLTZMAN | Senior Environmental Scientist | **RIDOLFI**
Direct: 206.413.7053 | www.ridolfi.com

From: jessica@ridolfi.com
Sent: Thursday, May 20, 2021 2:16 PM
To: Laura Shira <shil@yakamafish-nsn.gov>; DAUGHERTY Katie * DEQ <katie.daugherty@deq.state.or.us>
Cc: Teresa Michelsen <teresa@avocetconsulting.com>; Kim Magruder Carlton <Kim@carltonenv.com>; Robert Dexter <dexb@yakamafish-nsn.gov>; Julie Atwood <atwj@yakamafish-nsn.gov>; swan@yakamafish-nsn.gov
Subject: RE: Arkema Upland 2021 GWET SEE

Hi Katie

Here are our comments on behalf of Yakama Nation Fisheries.

The report notes that a majority of wells show concentration decreases over time, but some show significant increases. The report should discuss possible explanations for those increases, and should discuss implications. For example, are these resulting in any issues with the treatment system being able to keep up with the higher concentrations?

I didn't see any discussion of concentrations in the effluent discharged from the treatment system- where is that data being monitored and tracked?

Given that they are proposing reducing the frequency of monitoring, I think the above two questions are what I would need to know before I could weigh in on whether the reduction is appropriate.

Thanks
Jessica

JESSICA WINTER-STOLTZMAN | Senior Environmental Scientist | **RIDOLFI**
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From: jessica@ridolfi.com
Sent: Wednesday, May 5, 2021 4:17 PM

To: Laura Shira <shil@yakamafish-nsn.gov>; DAUGHERTY Katie * DEQ <katie.daugherty@deg.state.or.us>

Cc: Teresa Michelsen <teresa@avocetconsulting.com>; Kim Magruder Carlton <Kim@carltonenv.com>; Robert Dexter <dexb@yakamafish-nsn.gov>; Julie Atwood <atwj@yakamafish-nsn.gov>; swan@yakamafish-nsn.gov

Subject: RE: Arkema Upland 2021 GWET SEE

Thank you Katie—I wasn't able to access this via the link provided. I tried in Chrome and MS Edge, do you have any tips on how to open it? Is there a possibility to add it to the ECSI page [Web Documents for ARKEMA, Inc. \(state.or.us\)](#)?

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From: Laura Shira <shil@yakamafish-nsn.gov>

Sent: Wednesday, May 5, 2021 1:48 PM

To: DAUGHERTY Katie * DEQ <katie.daugherty@deg.state.or.us>

Cc: jessica@ridolfi.com; Teresa Michelsen <teresa@avocetconsulting.com>; Kim Magruder Carlton <Kim@carltonenv.com>; Robert Dexter <dexb@yakamafish-nsn.gov>; Julie Atwood <atwj@yakamafish-nsn.gov>; swan@yakamafish-nsn.gov

Subject: FW: Arkema Upland 2021 GWET SEE

Hi Katie. I'm slow to thank you for this info. We will let you know if we plan to review by the 5/26 comment deadline. -Laura

From: DAUGHERTY Katie * DEQ <katie.daugherty@deg.state.or.us>

Sent: Monday, April 26, 2021 8:35 AM

To: JHart@indecon.com; shil@yakamafish-nsn.gov

Cc: LACEY David J * DEQ <david.j.lacey@deg.state.or.us>

Subject: Arkema Upland 2021 GWET SEE

Hello Laura and Jennifer,

DEQ received the annual GWET [Groundwater Extraction and Treatment] System Effectiveness Evaluation for the Arkema Facility and is in the process of completing our review. The 2021 GWET SEE Report may be downloaded from [HERE](#). DEQ is passing it on for your information. If you plan on reviewing it and providing comments please let us know and do so within 30 days.

Background.

Arkema issued a GWET SEE in 2018. The report concluded that the current groundwater extraction system was not able to fully capture groundwater behind the barrier wall and proposed a series of actions to enhance gw recovery. Given the lack of capture, DEQ requested that an annual report be submitted that evaluated capture, document actions taken to enhance the system and proposed actions for the next year.

If you have any questions or have trouble downloading the document, please reach out to

David Lacey or me.
Thanks,

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